



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

DEC 13 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EPA WARNING LETTER

Mr. Patrick Bowe
Branch Manager
Crop Production Services, Inc.
3083 East Isaacs Avenue
Walla Walla, Washington 99362

Re: Inspection of Risk Management Program (RMP)
Crop Production Services, Inc. – Walla Walla, WA 388
EPA RMP Facility ID# 1000 0002 7099

Dear Mr. Bowe:

On August 1, 2016, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Crop Production Services, Inc. facility, located at 3083 East Isaacs Avenue, in Walla Walla, Washington. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Hazard Review:** Crop Production Services, Inc.'s hazard review failed to identify the safeguards used or needed to control the hazards or prevent equipment malfunction or human error as required by 40 C.F.R. § 68.50(a)(3). During the inspection, a potential hazard with a liquid transfer hose laying on the ground was not being protected from vehicle damage. Crop Production Services, Inc. did not address this hazard to the liquid transfer hose at the load in station in their hazard review. Reference CGA G-2.1-2014, Requirements for the Storage and Handling of Anhydrous Ammonia, 6th Ed., Section 6.7.1 with regards to the protection of container and appurtenances from vehicle damage.
2. **Operating Procedures:** Crop Production Services, Inc.'s operating procedures failed to address equipment inspections of the anhydrous ammonia storage process as required by 40 C.F.R. § 68.52(b)(8). During the inspection, Crop Production Services, Inc. stated that operators conduct daily visual inspections of process equipment of the anhydrous ammonia storage process during initial and normal startup, but did not document the inspections.

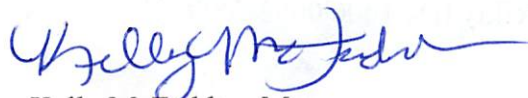
Please provide the documentation to substantiate that the areas of concern listed above have been corrected. A copy of the documents must be sent to Javier Morales, RMP Coordinator, within 14 days of your receipt of this letter and/or once the changes has been made. The documents may be sent via e-mail, fax or mail.

Javier Morales, RMP Coordinator
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, WA 98101
Fax: (206) 553-4743

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at: <http://www.epa.gov/rmp/guidance-facilities-risk-management-programs-rmp>.

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or morales.javier@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kelly McFadden", with a stylized flourish at the end.

Kelly McFadden, Manager
Pesticides and Toxics Unit